IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHRISTOPHER MCNAUGHTON, a : No. 2:21-cv-03802

Pennsylvania citizen,

Plaintiff :

v. :

UNITEDHEALTHCARE INSURANCE : CIVIL ACTION - LAW

COMPANY, a Connecticut corporation, : JURY TRIAL DEMANDED

UNITED HEALTHCARE, INC., a :

Delaware corporation, : BAYLSON, M.

Defendants :

PETITION OF LAW OFFICES OF SCOTT C. GLOVSKY FOR LEAVE TO WITHDRAW APPEARANCE

- 1. Plaintiff Christopher McNaughton was diagnosed with severe ulcerative colitis. McNaughton began treating with Dr. Edward Loftus, in May 2014, at the Mayo Clinic in Rochester, Minnesota due to the severity of McNaughton's ulcerative colitis.
- 2. In October 2018, after failing all other treatment options and doses, Dr. Loftus prescribed Remicade 20 mg/kg every 4 weeks and Entyvio 600 mg every 4 weeks to McNaughton (the "treatment"). Plaintiff began receiving the treatment.
- 3. After initially covering the treatment, United Healthcare Insurance
 Company denied coverage for the treatment and advised Plaintiff that it would no

longer cover the treatment. In response, Plaintiff brought this lawsuit. Plaintiff asserts claims for breach of contract, bad faith 42 Pa.C.S. § 8371, Unfair Trade Practices and Consumer Protection Law, and negligent misrepresentation.

- 4. Plaintiff brought a Motion for Temporary Restraining Order,
 Preliminary Injunction and Expedited Hearing on September 20, 2021. Before the
 Court heard the motion, defendants agreed to reverse their denial and agreed to
 continue covering the treatment.
 - 5. Discovery is scheduled to run until July 15, 2022.
- 6. Substantial irreconcilable differences have arisen between Plaintiff and Law Offices of Scott Glovsky, APC whereby Law Offices of Scott Glovsky, APC is seeking to terminate representation. If the Court deems it appropriate, we would participate in an in camera confidential conference with the Court.
- 7. Plaintiff was notified by counsel during a telephone conference on March 3, 2022, and subsequently in correspondence dated March 7, 2022, that Law Offices of Scott Glovsky, APC intended to withdraw their appearance.
 - 8. Plaintiff does not oppose this petition.
- 9. Granting this petition to withdraw appearance will not prejudice any other party to this action.
 - 10. Plaintiff respectfully request this Honorable Court to stay proceedings

for sixty (60) days to allow Plaintiff additional time to retain new counsel.

Wherefore, Law Offices of Scott Glovsky, APC respectfully requests that this

Honorable Court grant the Petition to Withdraw Appearance and grant a stay of

these proceedings for sixty (60) days to allow Plaintiff additional time to obtain

counsel.

DATED: March 10, 2022

RESPECTFULY SUBMITTED,

Law Offices of Scott Glovsky, APC

By: /s/ Scott Glovsky

Scott Glovsky CA ID. No. 170477 Attorney for Plaintiff

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Pennsylvania citizen,
Plaintiff CHRISTOPHER MCNAUGHTON, a: No. 2:21-cv-03802

UNITEDHEALTHCARE INSURANCE **CIVIL ACTION - LAW** JURY TRIAL DEMANDED COMPANY, a Connecticut corporation,

UNITED HÉALTHCARE, INC., a

Delaware corporation, BAYLSON, M. Defendants

CERTIFICATE OF SERVICE

I, Roberta Liao, hereby certify that on March 10, 2022, I caused a true and correct copy of Petition of Law Offices of Scott Glovsky, APC for Leave to Withdraw Appearance to be filed via the Court's ECF system, which constitutes service upon the following:

Jeffrey A. Lutsky, Esq. Chelsea A. Biemiller, Esq. Stradley, Ronn, Stevens & Young, LLP. 2005 Market Street, Suite 2600 Philadelphia, PA 19103-7018 JLutsky@stradley.com cbiemiller@stradley.com

> By: /s/ Roberta Liao Roberta Liao